

1 Michael N. Poli (State Bar No. 005461)  
2 [mpoli@pmzlaw.com](mailto:mpoli@pmzlaw.com)  
3 **POLI, MOON & ZANE, PLLC**  
4 403 Hill Street  
5 Reno, Nevada 89501  
6 Telephone: 602-857-8180  
7 Facsimile: 602-857-7133  
8 *Attorneys for Plaintiff*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 VIG DESERT OAKS, LLC, a Nevada  
12 limited liability company, individually and  
13 as assignee of La Folen Corporation and  
14 Vail Commercial Group, LLC,

15 Plaintiff,

16 v.

17 AMTRUST INSURANCE COMPANY, a  
18 Delaware corporation; and AMTRUST  
19 INSURANCE COMPANY OF KANSAS,  
20 INC., a Kansas corporation,

21 Defendants.

CASE NO. 2:24-CV-00034-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
FILE A REPLY IN SUPPORT OF ITS  
MOTION FOR DISCOVERY RULING  
UNDER RULE 30(C)(2), TO  
PREVENT COACHING  
OBJECTIONS AND INSTRUCTIONS  
NOT TO ANSWER**

22 Plaintiff VIG Desert Oaks, LLC (“Plaintiff”) and Defendants AmTrust Insurance  
23 Company and AmTrust Insurance Company of Kansas (collectively, “Defendants”)  
24 (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate to  
25 extend the deadline for Plaintiff to file a Reply in support of its Motion for Discovery Ruling  
26 Under Rule 30(C)(2), to Prevent Coaching Objections and Instructions Not to Answer (the  
27 “Deposition Motion”), from November 8, 2024, through and including November 15, 2024.

28 The reason for the extension is two-fold. First, the Parties are attempting a second  
mediation on November 7, 2024, and are hopeful to resolve this matter without further court  
intervention, thereby rendering the Deposition Motion moot.

Second, Plaintiff’s counsel has a large seven-day arbitration hearing beginning  
November 11, 2024, in Houston, Texas, as well as two scheduled depositions this week in

1 another case, making it difficult to devote the time necessary to timely file a reply to the  
2 Deposition Motion.

3 Defendants do not oppose the requested extension.

4 Therefore, Plaintiff requests a one-week extension, through and including November  
5 15, 2024, in which to file a Reply to the Deposition Motion.

6 RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of November, 2024.

7 **POLI, MOON & ZANE, PLLC**

8  
9 By: /s/ Michael N. Poli

10 Michael N. Poli  
11 Attorney for Plaintiff

12 **LEWIS BRISBOIS BISGAARD & SMITH,  
13 LLP**

14 By: /s/ Roger S. Raphael (w/permission)

15 Jeffrey D. Olster  
16 Julian Pardini  
17 Roger S. Raphael  
18 Attorney for Defendants

19 **IT IS SO ORDERED:**

20  
21   
22 United States Magistrate Judge

23  
24 DATED: November 6, 2024  
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